

Reply to: <http://www.regulations.gov/#!documentDetail;D=FCC-2013-0024-0001>  
From: Daniel Zarchy  
Date: March 24, 2013  
**Subject: Rates for Interstate Inmate Calling Services (Document ID FCC-2013-0024-0001)**

To Whom It May Concern:

I am writing to comment on the FCC's proposed action to regulate inmate-calling services to ensure that inmates have access to fair calling rates. I highly encourage this action by the FCC to protect inmate rights, reduce recidivism by helping inmates re-assimilate into society after release, and ensure that inmates' access to legal counsel is not obstructed by high costs.

During my time working at a law firm representing immigration detainees, we communicated with a number of clients at several holding facilities around Northern California. We were instructed by the employees to create an account with Global Tel Link, the only company available for these services. The company extended us a line of credit, as a law firm, but we continued to use their services and pay the fee for the next several years.

Unfortunately, these costs were extremely high, and we were forced to deposit money regularly. Many times we received a call from a jail stating that a client was trying to call us, but that our money had run out again and that we had to redeposit before the call could go through. These costs passed on to our clients, who for the most part were extremely poor immigrants who could not afford it. Global often charged several dollars per call to be initiated, plus a high per-minute rate once the call began.

As a result of Global Tel Link's pricing system, our clients incurred incredibly high costs. It was nearly impossible for us to contact our client, aside from calling the holding facility and asking a staff member to give our client the message, to varying levels of success. As a result often our clients were forced to call us the vast majority of the time, and if the particular attorney or member of our office was unavailable, we could only tell the client to call back soon and try again. Sometimes

our client called three or more times before reaching the right person, and thus incurred the “per-call cost” each time. Because of this price structure, the total costs incurred by our clients ended up being substantially different from the actual amount that the clients enjoyed Global Tel Link’s services.

Finally, I would simply suggest that under the proposed language, Section II, Paragraph 3: Public Policy Considerations, I would add into the language that part of the FCC’s action is intended to provide inmates with more accessible access to their legal counsel in addition to the stated purpose of inmates’ access to communication with their families.

I highly support increased regulation on this industry to prevent such high prices and to ensure access, particularly when it comes to a high per-call charge that seems dramatically higher than the costs required to make a call elsewhere.

Regards,

Daniel Zarchy